

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Luis Francisco MERCADO

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 13, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

*Code Section*Title 21 United States Code,
Section 963 & 952*Offense Description*

The defendant did knowingly and unlawfully import, attempt to import, and conspire to import, from a place outside the United States, to wit: The Republic of Mexico, to a place in the United States, to wit: Laredo, Texas, approximately 25.28 kilograms of methamphetamine, a controlled substance listed under Schedule II, of the Controlled Substance Act.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

☒ Continued on the attached sheet./s/ Jeffrey T. Foy*Complainant's signature*Special Agent Jeffrey T. Foy*Printed name and title*

Sworn to before me and signed in my presence.

Date: 12/15/2021*Judge's signature*City and state: Laredo, TexasDiana Song Quiroga, U.S. Magistrate*Printed name and title*

ATTACHMENT A

I am a Special Agent of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On December 13, 2021, Luis Francisco MERCADO, entered the United States at the Lincoln Juarez Bridge in Laredo, Texas, driving a passenger vehicle.
2. At primary inspection, MERCADO gave a negative declaration and stated he was traveling from Monterrey and going to Austin, Texas.
3. The CBP primary officer observed MERCADO demonstrating overly nervous behavior and trembling hands. MERCADO was referred to secondary inspection.
4. In secondary inspection, MENDOZA gave a second negative declaration. The vehicle was x-ray and anomalies were discovered in the vehicle gas tank.
5. A CBP canine alerted to the odor of narcotics in the vehicle gas tank area. CBP removed the vehicle gas tank and discovered a hidden compartment in the tank containing approximately 25.28 kilograms of crystal methamphetamine.
6. HSI special agents responded to the seizure and advised MERCADO of his Miranda Rights, which he waived. MERCADO admitted he knew the vehicle contained an unknown amount of methamphetamine.
7. MERCADO claimed he was threatened in Mexico to smuggle the methamphetamine into the U.S. and transport it to an unknown location in central Texas.